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May 8, 2020

BY ECF

The Honorable Vernon S. Broderick
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

Re: Lisboa, et al. v. J Sisters 57, Inc., et al., Case No. 14 Civ. 8115 (VSB) (RWL)

Dear Judge Broderick:

We represent Plaintiffs, and write jointly with Defendant Magdaly Santos, to provide this status report, pursuant to Your Honor's Order, dated March 26, 2020. Dkt. No. 197.

Plaintiffs' position is that discovery is complete and notes that since obtaining new counsel by the first quarter of 2019, Santos has served no discovery requests, but Defendant disagrees that her discovery is complete. Plaintiffs' counsel has agreed to re-serve document production and responses previously served on Santos's prior counsel and must still do that. Due to resources being limited by the Covid-19 crisis, with Santos's consent, Plaintiffs' counsel would like to do that by the end of May 2020. Santos's counsel reserves his right to argue that this previously served discovery is deficient. Plaintiffs reserve their right to oppose any discovery motion on timeliness grounds.

Defendant Santos anticipates submitting motions to streamline trial issues. Defendant Santos also anticipates submitting a motion seeking resolution of this matter after discovery closes. Plaintiffs reserve their right to object to such a motion on timeliness grounds.

The Parties have reviewed Your Honor's Rule 6, and respectfully request that they be allowed until August 14 to submit a Joint Pretrial Order, provided there is no pending motion.

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The Parties also request that a trial date be set for January 2021, provided there is no outstanding discovery or motion for discovery. The Parties expect a four-day trial.

Respectfully submitted,

/s/ Andrea M. Paparella

Andrea M. Paparella

cc: Edward Williams, Esq. (by ECF)

J Sisters 57, Inc. (by ECF)

Jocely Padilha c/o J Sisters 57, Inc. (by ECF)

Jonice Padilha c/o J Sisters 57, Inc. (by ECF)

Magdaly Santos c/o J Sisters 57, Inc. (by ECF)